

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

MAX MINDS, LLC,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No.: 1:24-cv-00779-JPH-MG
)	
TRIANGLE EXPERIENCE GROUP, INC., <i>et al</i> ,)	
)	
<i>Defendants.</i>)	

**DEFENDANT TRIANGLE EXPERIENCE GROUP, INC.’S MOTION TO
DISMISS PLAINTIFF MAX MINDS, LLC’S, COMPLAINT
OR, IN THE ALTERNATIVE, TO STAY**

Pursuant to Local Rule 7-1 of the United States District Court for the Southern District of Indiana and Rules 12(b)(6) and 13(a) of the Federal Rules of Civil Procedure, Defendant Triangle Experience Group, Inc. (“TEG”), by counsel, respectfully moves this Court to dismiss the Complaint filed by Max Minds, LLC, because each of its claims fail to state a plausible claim upon which relief may be granted, or, in the alternative, to stay this action pending resolution of the first filed related case, *Triangle Experience Group, Inc. v. Max Minds, LLC*, No. 1:24-cv-00650-JPH-MG (S.D. Ind. Dec. 28, 2023). In support thereof, TEG respectfully refers the Court to its Brief in Support, filed contemporaneously with this motion.

Respectfully submitted,

/s/ Richard D. Kelley

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